

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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In re :
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 :
 THE FINANCIAL OVERSIGHT AND :
 MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
 : Title III
 as representative of : Case No. 17-BK-3283 (LTS)
 : (Jointly Administered)
 THE COMMONWEALTH OF PUERTO RICO *et al.*, :
 :
 Debtors.¹ :
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**COFINA AGENT’S REPLY TO AAFAF’S OMNIBUS RESPONSE
TO MOTIONS TO COMPEL PAYMENT FILED BY THE RETIREE
COMMITTEE, COFINA AGENT, AND UNSECURED CREDITORS’ COMMITTEE**

Bettina M. Whyte (the “**COFINA Agent**”), in her capacity as the appointed agent of the Financial Oversight and Management Board for Puerto Rico (the “**Oversight Board**”), as representative of the Puerto Rico Sales Tax Financing Corporation (“**COFINA**”), respectfully submits this reply (the “**Reply**”) to *AAFAF’s Omnibus Response to Motions to Compel Payment Filed by the Retiree Committee [ECF No. 3513], COFINA Agent [ECF No. 3544], and Unsecured Creditors’ Committee [ECF No. 3604] [Docket No. 3655]* (the “**AAFAF Response**”), and in further support of the *COFINA Agent’s Urgent Motion to Compel the Puerto Rico Department of Treasury to Comply with the Orders Setting Procedures for Interim Compensation and*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“**COFINA**”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“**HTA**”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“**ERS**”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“**PREPA**”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Reimbursement of Expenses of Professionals [Docket No. 3544] (the “**Motion to Compel**”).² In support of the Reply, the COFINA Agent respectfully states:

1. On July 16, 2018, the COFINA Agent filed the Motion to Compel, which requests that the Court compel payment of the outstanding fees and expenses incurred by the COFINA Agent Applicants that are due and owing pursuant to the terms of the Interim Compensation Orders. On July 20, 2018, AAFAF filed the AAFAF Response, which (i) did not object to any of the outstanding fees or expenses identified by the COFINA Agent, and (ii) committed to pay such fees and expenses on or prior to July 25, 2018.

2. The COFINA Agent Applicants have provided all information requested by AAFAF to facilitate payment. As of the date hereof, AAFAF has sent wire transfers to certain COFINA Agent Applicants in partial satisfaction of their fees and expenses. However, numerous months of payments still have not been paid.

3. The COFINA Agent Applicants appreciate AAFAF’s recent efforts to pay all outstanding fees and expenses, and the COFINA Agent will file a notice of withdrawal of the Motion to Compel if all payments are made prior to the close of business on July 24, 2018. To the extent any payments are still outstanding as of such time, the COFINA Agent will proceed with the Motion to Compel at the omnibus hearing on July 25, 2018.

² Capitalized terms that are used but not defined herein shall have the meanings ascribed to such terms in the Motion to Compel.

Dated: July 22, 2018
New York, New York

Respectfully submitted,

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